

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

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**MARK K. MACRIS,**

**Plaintiff,**

**v.**

**Civil Action No. 17-CV-361**

**EXPERIAN INFORMATION SOLUTIONS, INC  
And SPECIALIZED LOAN SERVICING LLC,**

**Defendants.**

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**PLAINTIFF'S RESPONSE TO DEFENDANT'S MATERIAL  
STATEMENT OF FACTS**

1. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
2. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
3. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
4. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
5. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
6. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.

7. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
8. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
9. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
10. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.
11. Deny. Defendant's factual assertion is from an affidavit that is inadmissible as it is from a witness that was not previously disclosed to the Plaintiff in Defendant's 26(a)(1) disclosures nor was identified as the Defendant's 30(b)(6) witness.

Dated: December 5, 2018

s/Seth J. Andrews  
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